

Proceeding: IN THE MATTER OF 1998 BIENNIAL REGULATORY REVIEW -- AMENDMENT Record 1 of 1

Applicant Name: Terence Rybak

Proceeding Name: 98-143

Author Name: Terence Rybak

5000600743

Lawfirm Name:

Contact Name:

Contact Email: trybak@tir.com

Address Line 1: PO Box 260

Address Line 2:

City: Pinckney

State: MI

Zip Code: 48169 Postal Code:

Submission Type: CO

Submission Status: ACCEPTED

Viewing Status: UNRESTRICTED

Subject:

DA Number:

Exparte Late Filed:

File Number:

Calendar Date Filed: 09/24/1998 12:36:32 PM

Date Disseminated:

Filed From: EMAIL

Official Date Filed: 09/24/1998

Date Released/Denied:

Initials:

Confirmation #

Date Filed:

DOCKET FILE COPY ORIGINAL

RECEIVED

SEP 24 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

INTERNET FILING

98-143

9/24/98

No. of Copies rec'd
List A B C D E

Federal Communications Commission
Room 222, 1919 M Street NW
Washington, DC 20554

| | | |
|--|---|----------------------|
| In the Matter of |) | WT Docket No. 98-143 |
| |) | |
| 1998 Biennial Regulatory Review - - |) | RM-9148 |
| Amendment of Part 97 of the Commission's |) | RM-9150 |
| Amateur Service Rules. |) | RM-9196 |
| |) | |
| |) | |

To: The Commission

Comments of Terence Rybak, PCIA Certified Communications Technician,
NARTE Certified EMC Engineer, Amateur Radio Licensee W8TR
PO Box 260, Pinckney, MI 48169-0260

The goals of any revision of the Amateur rules should include:

- * to respect the requirement for code proficiency on frequencies below 30 MHz, since cw equipment can be assembled more easily than other types in an emergency, and a genuine disaster may render "hi-tech" equipment (internet, amateur infrastructure) inoperative
- * to simplify the rules by reducing the number of license classes
- * to avoid the fiasco of the ca. 1968 rules change that took away band privileges from existing licensees (e.g., penalizing General Class licensees by taking away part of their privileges below 30 MHz), and added a confusing number of license classes. The taking away of privileges was the equivalent of an "ex post facto" rule.
- * to provide incentive to upgrade to a higher class license by providing increasing frequency bands as the licensee upgrades
- * to encourage all licensees to advance radio technology by experimenting with different communication modes
- * to increase the pool of trained communications experts
- * to respect the existing infrastructure in equipment
- * to improve enforcement of the Amateur radio rules
- * to clarify the cw and written requirements for various classes of licensees

To accomplish these goals:

- * Limit code-free licensees to operation on frequencies above 50 MHz. This will permit those interested in digital modes to experiment with new methods of modulation
- * Permit experimental modulation modes to be used above 148 MHz with no restrictions
- * Permit any mode of operation (cw, am, ssb, digital, packet, rtty, facsimile, television, experimental/new modes) on a particular band to be used by all licensees having access to that band
- * Grant privileges on all bands below 30 MHz to any licensees who have passed a code test.
- * Grant larger portions of the bands below 30 MHz to those who have demonstrated greater proficiency at code and theory

In particular, I propose that:

- * existing Technician licensees be given all-mode privileges on all bands above 50 MHz
- * existing Novice and Tech Plus licensees (who have passed a 5 wpm code test), in addition to the above privileges, be given all-mode privileges on all bands below 30 MHz, in restricted segments of each band
- * existing General and Advanced class licensees (who have passed a 13 wpm code test), in addition to the above privileges, be given less restricted segments of each band below 30 MHz
- * existing Extra Class licensees, (who have passed a 20 wpm code test), be given full privileges on all bands

This will reduce the existing six classes of licenses to four.

In addition, I propose that:

- * the cw test require one minute of perfect copy and sending out of a total of five minutes, since perfect copy is required in emergencies and cw may be the only mode available
- * the written exam, besides multiple-choice questions, require the examinee to draw or correct schematic and block diagrams
- * the phone, digital, and rtty sub-bands be aligned with those of other countries in regions 1, 2, and 3. This may require two phone sub-bands on 7 MHz, for example. This would reduce interference by eliminating the use of two frequencies for one conversation.
- * the requirement for cw proficiency for frequencies below 30 MHz be retained
- * the written exam be the same for all licensees for a particular class of license, i.e., no "specialization"
- * that as much as possible, enforcement of the rules be privatized to a disinterested third party that could document and submit information to the FCC
- * no taking away or auctioning of Amateur radio frequencies for commercial or other use be permitted, such as occurred with 220-222 MHz and is proposed for 144-148 MHz and 440-450 MHz for use by LEOs. Amateurs cannot afford to compete with commercial interests for frequencies, and Amateur's investments need to be protected.

Sincerely,

Terence Rybak